

NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP

**Leed Environmental, Inc.
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October 4, 2018

By Electronic Mail and First Class Mail

Ms. Sheri L. Bianchin
Remedial Project Manager
Institutional Controls Coordinator
U.S. Environmental Protection Agency Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, IL 60604

**Re: NL Industries/Taracorp Superfund Site; Granite City, Illinois
Consent Decree – Quarterly Progress Report 50 (July-September 2018)**

Dear Ms. Bianchin:

As required by the Consent Decree for the NL Industries/Taracorp Superfund Site (the “site”), two copies of this letter are submitted, on behalf of the NL Industries/Taracorp Superfund Site Group (“Group”), to provide the U.S. Environmental Protection Agency (“EPA”) with a quarterly progress report for activities performed during the period from July-September 2018.

1. Actions Taken During Previous Quarter to Comply with the Consent Decree:

- **Institutional Controls:** During June 2018, the Group received and initiated efforts to review EPA's comments on the draft environmental covenant for the Taracorp property, the draft Institutional Controls Work Plan, and the Group's August 7, 2017 memorandum regarding remote fill properties. During the July-September period, the Group initiated efforts to respond to EPA's comments and update the Institutional Controls Work Plan. In addition, the Group prepared and submitted 7 draft environmental covenants to EPA for the 10 properties that comprise the main industrial site. The Group also prepared and submitted three draft environmental covenants to EPA for the Slough Road properties.
- **Visual Canvassing Report:** During June 2018, the Group received EPA's comments on the Group's January 9, 2017 Assessment of the Visual Canvassing Report. The Group performed additional historical research and sent a letter to EPA in July 2018 to provide the Group's responses to EPA's comments and to provide additional documentation in support of the Group's belief that no further action is necessary for the residential properties located at **NON-RESPONSIVE**.
- **Groundwater Monitoring:** In July 2018, the Group sent a letter, Scope of Work, and QAPP Amendments to EPA to document the groundwater sampling and related activities that the Group and its consultant, Environmental Works, Inc., plan to perform in conjunction with EPA's five-year review.

- **Operation and Maintenance:** During the July-September 2018 period, the following operation and maintenance activities were performed at the site:

July 27	The Group's contractor, Munie Greencare Professionals ("Munie"), cut the vegetation on the NON- property and the cap of the Taracorp pile.
September 7	The Group's project coordinator sent an email to Munie regarding the schedule for cutting vegetation on the NON- property.
September 7	The Group's project coordinator sent an email to the owner/operator of All Pallet Service who subsequently confirmed that repairs to the fence around the Taracorp pile were made and that the fence was in good condition.
September 7	The Group's project coordinator sent an email to Beelman River Terminals' representative regarding the schedule for the September 2018 operation and maintenance inspection and EPA's five-year review site visit.
September 17	The Group's project coordinator spoke to the Granite City Sanitation Department's representative in regard to Munie's schedule for cutting vegetation on the NON- property.
September 20	Munie cut the vegetation on the NON- property and areas around the Taracorp pile.
September 25	The Group's project coordinator performed a semi-annual operation and maintenance inspection at the site.
September 28	The Group's project coordinator sent a letter, log sheets, and photographs to EPA to document the results of the September 25, 2018 operation and maintenance inspection at the site.

- **Project Coordination:** During the July-September 2018 period and in addition to items previously noted, the Group's project coordinator communicated with the following parties regarding work at the site:

July 2	Submitted Quarterly Progress Report 50 to EPA.
July 2	Spoke to EPA's project manager and Illinois EPA's representatives in regard to EPA/Illinois EPA comments on the draft environmental covenant for the Taracorp (Taracorp pile) property.
July 6	Sent letter to the Madison County Recorder to request property deeds.
July 11	Sent a letter to the Group's consultant, Environmental Works, Inc. ("EWI"), to authorize EWI to perform groundwater sampling and related activities at the site on the Group's behalf in conjunction with EPA's five-year review.
July 17	Sent an email to EPA's project manager to clarify EPA's expectation in regard to institutional controls for the Venice/Eagle Park Acres alleys and Slough Road.
July 20	Received an email from EPA's project manager in regard to EPA's expectations associated with institutional controls for the Venice/Eagle Park Acres alleys and Slough Road.

July 23	Sent an email to EPA's project manager to confirm, based upon EPA's July 20, 2018 email, that the Group's understandings about the institutional controls for the Venice/Eagle Park Acres alleys and Slough Road are consistent with EPA's requests.
July 24	Sent a letter to EPA to summarize the groundwater sampling and related activities that the Group and its consultant, EWI, plan to perform in conjunction with EPA's five-year review. Details regarding the work were addressed in the attachments to the letter and included: (1) the Scope of Work – Groundwater Monitoring for Five-Year Review, which EPA previously reviewed and approved (and which the Group successfully implemented as part of EPA's reviews in 2008-2009 and 2013-2014); and (2) EWI's July 2018 QAPP Amendments.
July 25	Sent an email to EPA to provide the Group's July 25, 2018 letter, responses to EPA's June 20, 2018 comments, and additional documentation related to the Group's January 2017 Assessment of Visual Canvassing Report in support of the Group's belief that no further action is necessary for the residential properties located at NON-RESPONSIVE
July 25	Sent an email to EPA's project manager to request a meeting or conference call with EPA to discuss EPA's comments regarding institutional controls.
July 25	Sent an email to EPA to provide the revised draft environmental covenant for the Taracorp (Taracorp pile) property.
July 25	Sent an email to EPA to provide a draft environmental covenant for the NO NON- property.
July 26	Sent an email to EPA to provide a draft environmental covenant for the Mayco (Illinois) LLC properties.
July 26	Sent an email to EPA to provide a draft environmental covenant for the Scott Oney properties.
July 26	Sent an email to EPA to provide a draft environmental covenant for the Scott Oney/Donnye Shrum property.
July 26	Sent an email to EPA to provide a draft environmental covenant for the Taracorp (Unknown Road) property.
July 26	Sent an email to EPA to provide a draft environmental covenant for the Terminal Railroad Assn. property.
August 8	Sent an email to EPA's project manager in regard to potential dates in September 2018 for the five-year review site visit.
August 8	Spoke to EPA's project manager regarding institutional controls, the Contingency Measures Work Plan, and other activities.
August 9	In response to a request, sent an email to Illinois EPA's project manager to provide a Word version of the text of the Group's January 2017 Contingency Measures Work Plan.
August 9	In response to a request, sent an email to EPA's project manager to provide Excel files containing the: (1) Master List for Stack Emission Properties; and (2) Group's Summary of Efforts to Obtain Access and Perform Soil Sampling/ Remediation (2010-2016) for Denied Access Properties, SEP Properties, and Additional Properties

August 13	In response to a request, sent an email to EPA's project manager to provide the mailing address for the Group's chairperson for EPA's oversight bill.
August 15	Sent an email and letter to EPA to provide an updated certificate of liability insurance for the Group's consultant, Environmental Works, Inc.
August 30	Sent an email to Illinois EPA to provide a Word version of the 1998 Quality Assurance Project Plan for remedial activities at the site.
September 6	Sent an email to EPA and Illinois EPA to confirm the schedule for the five-year review site visit on September 26, 2018.
September 7	Spoke to Illinois EPA's representative in regard to the approximate schedule for soil sampling to be performed by Illinois EPA as part of the contingency measures program.
September 12	Finalized meeting arrangements with EPA for the September 26, 2018 five-year review site visit.
September 19	Sent an email to EPA's project manager to provide a list of issues for discussion related to the institutional controls program.
September 20	Sent an email to EPA to provide a draft environmental covenant for the US Carriers' properties at Slough Road.
September 20	Sent an email to EPA to provide a draft environmental covenant for the Transload Realty property at Slough Road.
September 20	Sent an email to EPA to provide a draft environmental covenant for the Brenda Ervin property at Slough Road.
September 25	Performed a semi-annual operation and maintenance inspection at the site.
September 26	Participated with EPA and Illinois EPA in EPA's five-year review site visit and participated in a meeting with EPA and Illinois EPA related to the institutional controls program at the site.
September 28	Sent a letter, log sheets, and photographs to EPA to document the results of the September 25, 2018 operation and maintenance inspection at the site.

2. Summary of Data and/or Results of Sampling and Tests Received:

- Not applicable for this reporting period.

3. Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Quarter:

- As previously indicated, the Group sent a letter, Scope of Work, and QAPP Amendments to EPA in July 2018 to document the groundwater sampling and related activities that the Group and its consultant, Environmental Works, Inc., plan to perform in conjunction with EPA's five-year review.

4. Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:

- The Group will continue to perform operation and maintenance activities at the site, as required. The Group's project coordinator will continue to update the Operation and Maintenance Plan as institutional controls activities are finalized.
- The Group anticipates that a conference call or meeting will be held with EPA to continue to discuss the Group's responses to EPA's comments on the draft Institutional Controls Work Plan and other institutional controls issues. The Group will continue to address EPA's comments and implement institutional controls.
- Upon receipt of EPA's authorization to proceed, the Group and Environmental Works, Inc. will perform groundwater sampling and related activities in accordance with the Scope of Work submitted to EPA on July 24, 2018.
- The Group will address comments, if any are received from EPA, in regard to the Five-Year Review Groundwater Monitoring Report, which was submitted to EPA on August 11, 2014 to summarize the results of the April 2014 groundwater monitoring event.
- The Group will address comments, if any are received from EPA, in regard to: (1) the Soil Sampling and Analysis Report, which was submitted to EPA in January 2014 to document the results from soil sampling activities at 73 residential properties in April – May 2011, September 2012, June 2013, and October 2013; (2) the Soil Sampling and Analysis Report Addendum, which was submitted to EPA in December 2015 to document the results of soil sampling performed on three residential properties **NON-RESPONSIVE** in June 2015 and one residential property **NON-RESPONSIVE** in November 2015; and (3) the Soil Sampling and Analysis Report Addendum No. 2, which was submitted to EPA in September 2016 to document the results of soil sampling activities performed on three residential properties **NON-RESPONSIVE** in August 2016.

5. Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:

- Not applicable for this reporting period.

6. Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:

- Not applicable for this reporting period.

7. Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:

- Not applicable for this reporting period.

Ms. Sheri Bianchin
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Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,

LEED ENVIRONMENTAL, INC.

A handwritten signature in black ink, reading "Jeffrey A. Leed". The signature is fluid and cursive, with the first name "Jeffrey" being more prominent and the last name "Leed" following in a similar style.

Jeffrey A. Leed
Project Coordinator

cc: Nicole Wood-Chi, Esq. – U.S. Environmental Protection Agency (by electronic mail)
Christopher Grubb, Esq. – U.S. Environmental Protection Agency (by electronic mail)
Mr. Brian Conrath - Illinois EPA (by electronic mail and first class mail)
Mr. Tom Miller – Illinois EPA (by electronic mail)
Technical Committee, NL Industries/Taracorp Superfund Site Group (by electronic mail)